

UNION COUNTY

**ENVIRONMENTAL HEALTH
ASSESSMENT AND IMPROVEMENT PLAN**

Strategic Environmental Goals for 2004

**County of Union
Division of Environmental Health
& Emergency Management
October, 2003**

INTRODUCTION

Purpose:

Union County's Environmental Health Assessment and Improvement Plan was developed by the Division of Environmental Health and Emergency Management (DEHEM) to define our countywide environmental health priorities. The County's priorities are then used to establish environmental health performance standards for the control of air pollution, solid waste, noise, hazardous substances and water pollution. This plan aims at keeping the County's standards and priorities inline with the New Jersey Department of Environmental Protection's statewide strategic environmental goals.

Background:

The County of Union is the second smallest county in New Jersey. However, its size is no indication of the vital resources that are housed within our boundaries. Union County is comprised of 21 municipalities, totaling 103.4 square miles, and is the home to 522,541 residents. It is the third most densely populated county in the State. Its top industries are manufacturing, retail, pharmaceuticals, petroleum and telecommunications. Union County houses the headquarters for Merck and Company, Lucent Technologies, Schering Plough and Wakefern Food Corp. and is home to the largest petroleum storage facility on the East Coast, Conoco Philips/Bayway Refinery.

The County of Union is considered one of the largest transportation hubs in the country. Newark International Airport is located in the county's Northeast corner and ranks in the top five busiest airports nationwide. Not far from the airport is Port Elizabeth, the largest container cargo port on the East Coast. The county is also transected by several major interstates, federal, state and county highways including the NJ Turnpike, Garden State Parkway, Routes 1 & 9, 78, 22, 24, 82 and 27. The Arthur Kill is one of the world's busiest waterways, often used as major transportation routes for barges and small tankers that carry oil and hazardous materials. Numerous rail systems with heavy freight concentration also transverse the county.

Personnel

The Division of Environmental Health and Emergency Management has a total of 13 full-time employees. It is comprised of two separate offices: The Office of Emergency Management/HazMat and The Bureau of Environmental Health Enforcement.

Given the broad range of services provided by our agency, it is often difficult to meet all the environmental needs of our service community with limited field personnel. Our basic responsibilities include hazardous materials response, air complaints and inspections, solid waste complaints and inspections, water samples, and noise complaints. Our priorities in the past have always been the air and hazardous materials programs. Given the heightened state of awareness we are all operating under, environmental challenges have become even greater.

Chemical, biological and radiological preparedness continues to be a primary focus for all those in the response community. These issues have forced the public health community to interface with the emergency management community on a routine basis. Coordinating training, providing support, and sharing resources has forged alliances and improved countywide response capabilities.

Bioterrorism, WMD, mass decontamination – all new initiatives that demand our full attention above and beyond are normal charges. And while there is increased funding to address some of the county's equipment needs, there has been no new funds for increased staffing. Current personnel and resources are taxed to the limit. It is essential that additional funding be made available to hire more employees to handle the critical issues facing the public safety and health agencies today.

Strategic Environmental Goals for 2003

I. Environmental Priorities, Goals & Standards:

1. CLEAN AIR: The air in the County of Union will be healthful to breathe, and air pollutants will not damage our forests, land and water bodies.

Air Pollution Control has been and will continue to be one of Union County's highest CEHA priorities, with response to citizen complaints remaining our paramount concern. The Bureau developed a "Clean Air for Union County – Let's Work Together" flyer this year in an effort to better educate its residents about its response capabilities to odor complaints. The flyer outlines the State Air Pollution Control Code, provides an overview of the complaint process and gives the number to report a complaint 24 hours/day. Flyers are given out at various county events and health fairs along with our idling enforcement flyers. Staff has responded to just over 100 air complaints this year, which represents about a 20% decrease from last year.

The Union County Bureau of Environmental Health Enforcement (UCBEHE) will continue its Air Pollution Control Program in 2004 with few changes. UCBEHE investigators will continue to conduct inspections of Gas Stations, Dry Cleaners and B Sources. Inspections performed in 2003 will exceed the mandated 275 as outlined in our contract.

Union County also initiated an "Air Toxics" inspection program for 2003. Thirteen facilities were inspected to evaluate compliance of their Emergency Generators with the State Air Regulations. Information on 44 Emergency Generators was accumulated for the DEP database. The Bureau will be available to continue the Air Toxics Study in 2004 if requested by the NJDEP.

Union and Middlesex Counties assisted the DEP Division of Minor Source Compliance (MSC) with completely revising all air program field inspection forms based on regulations and DEP requirements. Our staff also assisted with the training of 3 other county CEHA agencies to initiate air enforcement programs.

In addition to our mainstay inspections, the UCBEHE will continue to enforce broader initiatives that have a more direct impact on the air quality in Union County. In 2001, Union County began an enforcement program for the NJDEP Idling Standard. A flyer, outlining the standard itself and the strict enforcement criteria, was developed and disseminated to the affected population. This was expanded in 2003 and used as part of an education outreach effort to the busing companies servicing Union County schools. Educational information was sent to each bus company, bus driver, as well as each school district. Even with prevention tools in place, Union County issued its first bus company idling NOV's this year.

A new source of concern resulting in violations was the use of waste oil from internal combustion engines to fuel facility heating units. Although recycling is always encouraged, there are stringent DEP permitting and record keeping requirements due to a greater variety and concentration of pollutants in waste oil, which impact air quality, than those produced by commercial fuels. We will continue to search for these sources of potential pollution that require DEP permits, registration, air pollution controls, emission monitoring and record keeping.

The objectives outlined above are in keeping with both statewide and countywide initiatives and are achievable by our present staff. Currently, the Bureau of Environmental Health Enforcement has four full-time personnel who are trained and qualified for air complaint investigations and facility inspections that are available for timely, 24-hour response to county-wide odor complaints.

Activities: Continue to conduct inspections of Gas Stations, Dry Cleaners and B Sources to determine compliance with the NJDEP's air pollution control regulations.

Continue to respond and investigate complaints as referred to this office by citizens and NJDEP.

Compile and maintain files and records to support NJDEP and County enforcement actions.

Implement an idling enforcement program in areas where idling is a problem. Implement an outreach program to the business community to assist them with their compliance efforts and concerns.

Complete and Air Toxics Inventory (if requested by NJDEP)

Deliverables: A. Submit all facility compliance monitoring inspection reports to NJDEP's Minor Source Compliance Investigation Program within 60 days of completing the inspection. Submit all inspection reports no later than December, 2003.

B. Compile enforcement data relative to idling enforcement program.

2. CLEAN AND PLENTIFUL WATER: New Jersey rivers, lakes and coastal waters will be fishable, swimmable and support healthy ecosystems. Surface and ground water will be clean sources of water. Every person in New Jersey will have safe drinking water. Adequate quantities of surface and ground water will be available for all uses.

Water pollution control efforts have been ongoing in Union County since the UCBEHE was designated as the CEHA lead agency in 1999. During the past five years, the County has participated in the volunteer ambient river monitoring program, which involves taking water samples at specified locations over a 5-week period in the summer. County staff will continue to assist in this endeavor as deemed necessary by the State.

With the Private Well Testing Act in place, there will be a marked emphasis on meeting the legislative initiatives. While the UCBEHE has been designated as the contact for any well failures in Union County, an immediate notification will be made to the designated municipal health department. The Bureau worked with the municipal health departments in 2002/2003 to compile a database of all private wells located in Union County. The intent was to ascertain general information about each well along with testing data; although finding reliable data on many of the parameters requested proved to be the biggest challenge.

In addition to the Bureau of Environmental Enforcement, the Division of Environmental Health and Emergency Management also houses the Union County Hazardous Materials Response Team (HazMat). Response to and mitigation of waterborne incidents have been and will continue to be of paramount concern, although it must be noted that enforcement action rarely results from these complaints. A responsible party is rarely identified and runoff is often found to be a key factor in water contamination.

Activities: Continue to collect surface water samples at the NJDEP selected ambient surface water stations at a frequency of 5 samples per location over a 30-day period.

Continue to respond to complaints involving waterborne hazardous materials incidents, ensuring mitigation and remediation and initiate enforcement activities where warranted.

Maintain a database with support from the local health departments, of private wells in Union County.

Continue to perform vital environmental health functions (i.e. Boil Water Orders) in the event of a natural disaster.

Deliverables: A. Conduct inspections at the frequency specified in the CEHA contract.

B. Deliver ambient surface water samples to NJDEP courier as specified.

C. Act as repository for all well failures in Union County; make immediate notification to local health department.

D. Update/maintain private well database of private wells by municipality.

- 3. Safe and Healthy Communities:** Every New Jersey community will be free from unacceptable human health and ecological risks due to direct exposure from hazardous substances and other potentially harmful agents. Natural resources will be managed to protect the public from floods, fires and storms.

NOISE

The investigation of citizen complaints relative to noise is an important issue in Union County. Investigators are involved in at least one high-profile, sensitive case each year. Currently, the Bureau of Environmental Health Enforcement has four full-time personnel who are trained and qualified for noise complaint investigations that are available for timely, 24-hour response. It is our plan to continue to investigate such complaints, and if applicable, enforce these regulations to achieve compliance.

The Bureau has responded to twenty noise complaints thus far in 2003, which is a significant increase over the total of 13 from last year.

Activities: Respond to and investigate all noise complaints received from citizens and NJDEP which are under the jurisdiction of the State Noise Code and model Noise Control Ordinances adopted by local Boards of Health.

Compile and maintain files and records to support NJDEP and county enforcement actions.

Maintain certification of at least two individual(s) on staff in the performance of noise control investigations. Maintain at least one sound level meter and associated sound measurement equipment in accordance with NJAC 7:29-2.1 et. seq.

Deliverables: A. Submit to NJDEP (at CEHA audit) quarterly reports of investigations.

PESTICIDES

The Bureau of Environmental Enforcement initiated a pesticide compliance program in 2003, consisting of inspections of 8 landscapers, 10 schools, and 7 apartment buildings. All four field investigators were trained to conduct the routine inspections and all 25 will be complete by year-end.

Activities: Conduct routine inspections of schools, landscapers, and rental properties to determine whether the owner or operator has applied any pesticide and, if so, whether such application was performed by a certified and registered pesticide applicator, operator and/or registered business.

Assess and evaluate citizen complaints, including misuse complaints as per the "Standard Operating Procedures for Performing Pesticide Control Investigations under CEHA."

Deliverables: A. Submit to NJDEP quarterly reports of investigations.

SITE REMEDIATION PROGRAM

Under the direction of the Division of Emergency Management, the County of Union instituted a Hazardous Materials Response Team in 1990, servicing 19 of the County's 21 municipalities. A decade later, the County HazMat team broadened its coverage to include the entire county. Through cross training of personnel, eight (8) full-time trained responders are in the Division of Environmental Health and Emergency Management (DEHEM), and the team has in excess of 20 trained volunteers. Two additional hazardous materials technicians were added in 2003.

Union County deems hazardous materials response as its number one CEHA priority, with immediate response to complaints being the most critical element. The DEHEM has logged in 766 hazardous materials incidents thus far in 2003. Numbers continue to remain high with the increased attention placed on the higher threat levels and possible WMD events, etc. A new protocol was instituted this year whereby the Hazardous Materials Response Team is sent out on all of the Bomb Squad calls.

Training is undoubtedly the biggest challenge facing hazardous materials response teams today. CRBN (chemical, radiological, biological and nuclear), decontamination, and PPE training are not only required for our full time and volunteer hazmat team members, but our agency is also charged with assisting local police, fire, EMS and even hospitals with their training.

While the Division of Environmental Health and Emergency Management has been successful in receiving grant funding for equipment, there has been NO funding available for additional personnel. It is almost impossible to meet the increased demands for training and response with the same level of staffing as pre-September 11th.

The Bureau of Environmental Health Enforcement has been participating in NJDEP's Underground Storage Tank (UST) Inspection program for the past four years. In addition to the 100 facility inspections per year, the UCBEHE is contracted to conduct 20 re-inspections. All of these numbers will be exceeded for 2003.

Activities: Maintain an integrated Hazmat emergency preparedness system throughout Union County. This system will be enhanced, to the extent practicable, to meet the draft standards for Hazmat Emergency Response Teams developed by the New Jersey State Police.

Respond to all hazardous material emergencies referred by NJDEP to assess environmental health threats. Make recommendations to and coordinate these response actions with appropriate federal, State and local agencies. Ensure that personnel assigned to respond to hazmat incidents are properly trained and participating in a medical surveillance program.

Maintain a core of trained and equipped personnel that are capable of responding to hazardous material incidents in accordance with the draft standards document. Ensure personnel are participating in a medical surveillance program.

Maintain an adequate supply of hazmat disposable equipment, such as booms, pads, sweeps, etc. and equipment, such as communication devices, decontamination showers, air monitoring devices, etc., which conforms to the draft standard for inter-operability.

Continue to investigate hazardous materials complaints received from citizens and NJDEP. Refer cases requiring remedial action to NJDEP.

Continue to participate in the NJDEP UST pilot project. This will involve conducting comprehensive inspections of regulated underground storage tanks (UST's) to determine compliance status, to remediate problems and prompt compliance when necessary.

Enhance preparedness to assist public safety officials with the response to and assessment of actual or suspected releases of chemical and or biological agents.

Assist public safety officials with assessment and evaluation of risk to the population should certain chemical facilities and transportation routes be the targets of sabotage or terrorism.

- Deliverables:**
- A. Submit to NJDEP (at CEHA audit) proof of meeting PEOSHA health and safety training requirements.
 - B. Follow NJDEP notification protocol and submit investigation reports as required by NJDEP.
 - C. Follow NJDEP guidelines and protocols for UST inspections.
 - D. Submit completed inspection reports as required by NJDEP.

SOLID WASTE PROGRAM

Consistency with the NJDEP Solid Waste SOP remains a priority for Union County's Solid Waste Program. Attaining uniform enforcement between State and County, between Counties and even between solid waste programs is the ultimate goal of our CEHA solid waste initiatives.

Response to citizen complaints is at the core of the CEHA objectives. The number of complaints remained fairly consistent from last year although the number of violations increased. With the increase in West Nile Virus and heavy rainfall in the spring/summer of 2003, investigators have made a concerted effort to address the proper storage of tires. Illegal dumping incidents continue to be a persistent problem in Union County and will continue to be aggressively investigated and enforced.

Facility inspections will be continued in 2004 – based on the need and number determined by the NJDEP Solid Waste Division. UCBEHE staff will continue to conduct hauler interviews to ensure proper issuance of licenses.

Union County is completing their third year of conducting *Greenstart Compliance Inspections* at municipal public works facilities. Ten more initial DPW inspections were performed in 2003, bringing the total to 30. Seventeen of these facilities have fully complied with State regulations. Several more have minor compliance issues that will be resolved prior to their next regularly scheduled re-inspection. We will continue to perform re-inspections, monitor their progress and assist the operators until 100% compliance is achieved.

Greenstart Inspections have been of mutual benefit to both the County and the towns. Favorable relationships have been formed while promoting improved compliance county-wide. Continued participation in some aspect of this *Greenstart Initiative* would be welcome if deemed necessary by the NJDEP.

Union County initiated a program in 2002 to assist municipalities to register leaf transfer facilities (LTF); there were initially four NJDEP approved facilities. Since that time, nine more towns have applied for LTF exemptions. Two of these were approved by the State in 2003 and six are pending DEP approval, and one was rejected. Convenience Center inspections were also initiated this year (9 facilities, 18 inspections) using County designed and DEP approved forms.

The Division of Environmental Health and Emergency Management is also responsible for implementation of countywide Household Hazardous Waste (HHW) Programs. Although these programs are run outside the umbrella of the CEHA, there are elements that tie in. Four (4) events are planned for 2004.

Activities: Continue to investigate all solid waste complaints received from citizens, local health departments, commercial businesses and the NJDEP.

Conduct routine compliance monitoring inspections of Solid Waste Facilities (Class A, Transfer Stations, Compost) as deemed necessary by the NJDEP, continue to update the lists of these sites and provide them to the NJDEP Solid Waste Program.

Continue to monitor solid waste haulers to ensure compliance with the Solid Waste Management Act.

Conduct waste flow enforcement investigations.

Conduct interviews of solid waste transporters referred by NJDEP or other counties.

Conduct *greenstart* compliance inspections as needed.

- Deliverables:**
- A. Enforce the State Solid Waste Management Act and initiate enforcement proceeding pursuant to NJDEP guidelines.
 - B. Conduct frequency and projected annual total of inspections as per program CEHA contract.
 - C. Submit reports as required by NJDEP.
 - D. Submit completed inspection reports as required by NJDEP.

4. Open and Effective Government The County will fulfill its vision and mission to achieve its goals through the involvement of citizens and stakeholders as partners through a commitment to quality principles and methods as a means to continually improve its operations.

Union County proved in 2003 that their organizational structure was right all along! Environmental Health and the Office of Emergency Management (OEM) have worked together under the same umbrella for nearly ten years in Union County. So, while many CEHA agencies in NJ struggled to incorporate the Office of Emergency Management into their work programs and decision-making structures, the Division of Environmental Health and Emergency Management readily incorporated the NJDEP suggested changes into their Hazardous Materials Work Plan and moved on.

The key to emergency management is relationship building and that philosophy is the credo for the DEHEM. Police, fire, health, public works, EMS, and hospital representatives are all considered partners in our daily operations. The Division's overall effectiveness to respond and protect the health and safety of the residents of Union County is significantly enhanced by these interactions.

To that end, Union County created a new Freeholder Advisory Board, which met monthly in 2003. The "Public Health Weapons of Mass Destruction" Board consists of health officers, police, fire, volunteer and EMS reps in addition to OEM staff. The training subcommittee of that Board is also working to meet the training needs of police, fire and EMS agencies in the County.

Monthly meetings are held with representatives from all the acute and non-acute care hospitals in Union County. DEHEM staff regularly attend the Union County Health Officer Association meetings which provides updates on LINCIS.